

**UNITED STATES COURT OF APPEALS  
FOR THE THIRD CIRCUIT**

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**NATIONAL LABOR RELATIONS BOARD**  
**Petitioner,**

**v.**

**Case No. 18-3009**

**ALARIS AT HAMILTON PARK  
HEALTH CARE CENTER,**  
**Respondent.**

**MOTION FOR  
LEAVE TO  
INTERVENE**

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1199 SEIU United Healthcare Workers East, moves this Court, pursuant to Rule 15 of the Federal Rules of Appellate Procedure, for leave to intervene in this proceeding in which Petitioner National Labor Relations Board seeks summary entry of a judgment enforcing of its Decision and Order issued against Respondent Alaris at Hamilton Park Health Care Center, on May 14, 2018, in Board Case No. 22-CA-180566, reported at 366 NLRB No. 90.

Dated: September 27, 2018

/s/ Katherine H. Hansen  
Katherine H. Hansen

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Attorneys for 1199 SEIU United  
Health Care Workers East

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**ALARIS AT HEALTH CARE HEATH  
CARE CENTER**  
**Respondent.**

**RULE 26.1 DISCLOSURE  
STATEMENT**

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1199 SEIU United Healthcare Workers East (“1199 SEIU”), has filed the accompanying motion for leave to intervene and submits this disclosure statement pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure.

1199 SEIU is not a corporation, but rather is a labor organization. 1199 SEIU is affiliated with the Service Employees International Union.

Dated: September 27, 2018

/s/ Katherine H. Hansen  
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**ALARIS AT HAMILTON PARK HEALTH  
CARE CENTER,**  
**Respondent.**

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**DECLARATION OF KATHERINE H. HANSEN IN SUPPORT OF MOTION  
FOR LEAVE TO INTERVENE**

I, Katherine H. Hansen, an attorney duly admitted to practice before the United States Court of Appeals for the Third Circuit under penalty of perjury, declare that the following statements are true and correct:

1. I am a partner at the firm of Gladstein, Reif & Meginniss, LLP, counsel to 1199 SEIU United Healthcare Workers East (“1199 SEIU” or “the Union”). I was admitted to practice before the United States Court of Appeals for the Third Circuit in 2014 and am a member in good standing. I submit this declaration in support of 1199 SEIU’s motion for leave to intervene in this matter in which Petitioner National Labor Relations Board (“NLRB” or “Petitioner”) seeks entry of a summary judgment enforcing its Decision and Order issued against Respondent Alaris at Hamilton Park Health Care Center (“Respondent”) on May 14, 2018, in Board Case No. 22-CA-180566, reported at 366 NLRB No. 90.

2. In that Decision and Order, Petitioner found that Respondent violated Sections 8(a)(1) and (5) of the National Labor Relations Act (“the Act”) by failing and refusing to provide the Union with requested information and ordered Respondent to, *inter alia*, furnish the Union with requested information.
3. 1199 SEIU, a labor organization, was the charging party in the underlying NLRB proceeding and participated in the NLRB proceeding.
4. The NLRB’s Decision and Order directly affects the Union, as the Union is the exclusive collective bargaining representative of Respondent’s non-professional employees.
5. I am fully familiar with the facts and issues presented in this matter, as this firm participated on behalf of the Union in the underlying unfair labor practice proceeding.
6. The Union moves to intervene in support of the NLRB’s Decision and Order.

Dated: New York, New York  
September 27, 2018

/s/ Katherine H. Hansen  
Katherine H. Hansen

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HEALTH CARE CENTER,**  
**Respondent.**

**CERTIFICATE  
OF SERVICE**

-----X  
I, Katherine H. Hansen, hereby certify that a true copy of each of 1199 SEIU United Healthcare Workers East's Motion for Leave to Intervene, Declaration of Katherine H. Hansen in Support of Motion for Leave to Intervene, and Rule 26.1 Disclosure Statement, have this day been duly served by electronic filing with the Court's CM/ECF system upon:

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Dated: September 27, 2018  
New York, New York

/s/ Katherine H. Hansen  
Katherine H. Hansen

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